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September 6, 2024

By ECF

Honorable Cathy Seibel
United States District Judge
United States Courthouse
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: United States v. Frank Butselaar
22 Cr. 560 (CS)

Dear Judge Seibel:

We are writing to request an extension of time for Mr. Butselaar to respond to the Government's Motions *in Limine* ("MIL") from September 20th to October 4th.¹ The Government's MIL, filed on August 30, 2024, was a compilation of 11 motions to admit certain evidence, and six motions to preclude Mr. Butselaar from introducing certain evidence or arguments, totaling 63-pages. Among them are motions to admit several instances of uncharged conduct or other bad acts, including evidence of an investigation in the Netherlands related to Dutch tax filings.

Even if Ms. Fischer and I were able to dedicate all of our time to responding to the Government's MIL, it is virtually impossible to do so by September 20th simply given its sheer scope. Nor are we able to commit ourselves to a single task given the proximity to trial, when we must continue to review the millions of pages of discovery and 3500 materials for 36 potential witnesses, which to date amounts to more than 900 documents. In addition, while we anticipate Mr. Guha will assist with Mr. Butselaar's response to the MIL, he has been assigned to the case

¹ We informed the Government earlier today that we intended to request additional time to respond to the MIL, but do not know their position as of yet.

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for less than a week and is still familiarizing himself with facts and legal issues, both of which are complex.

For the foregoing reasons, we respectfully ask the Court to grant Mr. Butselaar until October 4, 2024, to file his response to the Government's MIL.

Thank you for your consideration in this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kerry A. Lawrence".

Kerry A. Lawrence
Samidh Guha
Diane Fischer

cc: All Counsel (via ECF)